



UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Ellen S. Ewald,

Civil No. 11-cv-02116 (SRN/SER)

Plaintiff,

vs.

**PLAINTIFF'S SECOND SET OF**  
**INTERROGATORIES TO**  
**DEFENDANT**

Royal Norwegian Embassy,

Defendants.

**TO: DEFENDANT ABOVE-NAMED AND THEIR ATTORNEYS OF RECORD, SEAN SOMERMEYER, ESQ., DANIEL WILCZEK, ESQ., AND JOEL SCHROEDER, ESQ., FAEGRE, BAKER DANIELS LLP, 2200 WELLS FARGO CENTER, 90 SOUTH SEVENTH STREET, MINNEAPOLIS, MN 55402-3901.**

PLEASE TAKE NOTICE that Plaintiff Ellen S. Ewald ("Ewald") requests that Defendant Royal Norwegian Embassy ("Embassy") pursuant to Rule 33 of the Federal Rules of Civil Procedure, by counsel, hereby requests answers under oath within thirty (30) days from the date hereof to the following Interrogatories. Failure to provide information sought by these Interrogatories will result in objection at time of trial to any attempt to offer the same. These Interrogatories are to be deemed continuing so as to require supplemental answers if Defendant obtains additional information between the time answers are served and the time of the trial.

## **DEFINITIONS AND INSTRUCTIONS**

1. “Plaintiff” includes and refers to Ellen S. Ewald, her attorneys, agents, or representatives.

2. “Defendant” or “Defendants” or “you” or “your” includes and refers to Royal Norwegian Embassy (“Embassy”) and their attorneys, agents, representatives or predecessors or successors in interest.

3. “Person” and “individual” include not only natural persons but also corporations, companies, firms, partnerships, associations, joint ventures, governments, or agencies therefore, quasi-public entities, trusts, estates, and other entities.

4. “Document” includes:

a. All communications, letters, telegrams, cablegrams, correspondence, facsimiles, memoranda, records, reports, notes, drafts, proposals, minutes, affidavits, books, papers, magazines, newspaper articles, logs, calendars, diaries, journals, lists, brochures, pamphlets, literature, advertising, computations, tabulations, computer printouts, bills, statements, invoices, vouchers, bills of lading, schedules, purchase orders, contracts, agreements, books of original entry, accounts, checks, tape-recordings, Photostats, motion pictures, slides, photographs, sketches, drawings, charts, graphs, video recordings, transcripts, computer or other electronic or digital recordings, computer tapes or disks, e-mails, and other similar objects, or any other written, printed, recorded, or video matter or tangible thing on which or by which any words or phrases are affixed, displayed, recorded, or conveyed (e.g., post-it type notes);

b. Copies of such documents upon which any initialing, notation, or handwriting of any kind not appearing on the original;

c. Such documents, whether they were prepared by you, or your agents, employees, consultants, representatives, or attorneys, for their own use, your use, or for transmittal in any manner, or were received by any means by you; and

d. Such documents, wherever located, whether in the files of any agent, employee, consultant, representative, or attorney of yours, or in any file in your possession or direction or control.

5. "Communication" includes all correspondence, letters, telephone or other conversations, electronic or video mailings, facsimile, e-mails and other transmissions, and all other written or oral conveyances of documents or information between or among persons.

6. Whenever in these Interrogatories you are asked to identify a document, you shall designate the type of document and shall state:

a. Information sufficient to enable identification of the document, including its date, the name of the addressees, the name of the signor or signors, authors, the title or heading of the document;

b. The identity of the persons to whom the original and all copies were sent; and

c. The present or last known location or possessor of the original of the document and of each copy thereof.

7. Whenever in these discovery requests you are asked to identify or produce a document which is deemed by you to be properly withheld from production for inspection or copying on the ground of privilege or other protection, you shall provide a listing thereof by title or subject heading, date, author, addressee, and person copied, including a statement of the statutory privilege asserted, and other appropriate identifying information such that is able to assess the applicability and validation of the privilege asserted.

8. Whenever in these Interrogatories you are asked to identify a person, you shall state:

- a. The person's name and present or last known residential address;
- b. The person's present or last known business address;
- c. The person's present or last known occupation, title, and employer; and
- d. The person's occupation, title, and employer at the time of the event inquired about in these Interrogatories.

9. The singular form of a word, e.g., document or person, shall refer to the plural as well, and words used in the masculine gender also include the feminine.

10. Whenever in these Interrogatories you are asked to identify or describe an oral or written communication or other event, you shall set forth the following:

- a. Its substance;
- b. The date and time it occurred;
- c. The place it occurred (both sending and receiving, e.g., telephone conversation);
- d. The identity of each sender and recipient, for each participant, for each event; and
- e. The identity of each and all persons present when the conversation or event took place.

11. Whenever in these Interrogatories you are asked to “describe in detail” when used in reference to a factual situation or any allegation, you shall state with particularity all facts known to you, connected with, bearing upon, or relating in any way to matters of which inquiry is made.

12. Where you object that an Interrogatory is overly broad, burdensome, or oppressive, state facts or other evidence demonstrating the nature of the alleged burden.

### **INTERROGATORIES, SECOND SET**

**INTERROGATORY NO. 21:** Identify and describe the Defendant’s e-mail systems architecture and provide:

- a. For E-mail Archive Servers used for preservation, identify the server names, geographic locations, software product and versions used.

b. For E-mail Backup Servers, identify the server names, geographic locations, software product and versions used.

c. For Exchange Servers, identify the server names, geographic locations, software product and versions used.

d. For Outlook Clients Ellen Ewald, Gary Gandrud, Walter Mondale, Jan Aage Larsen, Berit Johnne, Elin Rognlie, Anders Davidson, Christina Carleton, Johann Vibe, Liv Morch Finborud, Elizabeth Wemberg and Wegger Strommen, identify the client names, geographic locations, software product and versions used.

**INTERROGATORY NO. 22:** Identify and describe the tools and methods used by Defendant to preserve, collect, process and produce evidence in this case.

ENGELMEIER & UMANAH, PA

Dated: June 3, 2013.

By: 

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**ATTORNEYS FOR PLAINTIFF**